

1 PHILLIP A. TALBERT
2 United States Attorney
3 KAREN A. ESCOBAR
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099
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6 Attorneys for Plaintiff
United States of America
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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JORGE CALDERON-CAMPOS,
ALBERTO GOMEZ-SANTIAGO,
BYRON ADILIO ALFARO-SANDOVAL,
FRANCISCO JAVIER TORRES MORA,
JOSE ANGEL BELTRAN-CHAIDEZ, AND
MARK GARCIA,
17 Defendants.

18 UNITED STATES OF AMERICA,
19 Plaintiff,
20 v.
21 JORGE CALDERON-CAMPOS,
22 Defendant.

CASE NO. 1:22-CR-00131-JLT-SKO
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: June 7, 2023
TIME: 1:00 p.m.
COURT: Hon. Magistrate Judge Sheila K. Oberto

CASE NO. 1:22-CR-00130-JLT-SKO
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: June 7, 2023
TIME: 1:00 p.m.
COURT: Hon. Magistrate Judge Sheila K. Oberto

24 STIPULATION
25

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

27 1. By previous order, these matters were scheduled for a status conference on June 7, 2023,
28 before U.S. Magistrate Judge Sheila K. Oberto.

1 2. On September 30, 2022, U.S. District Judge Jennifer L. Thurston found that these matters
2 are related.

3 3. By this stipulation, the parties move to continue the status conference until September 20,
4 2023, before U.S. Magistrate Sheila K. Oberto, or the Court's earliest convenience, and to exclude time
5 from calculation under the Speedy Trial Act between June 7, 2023, and September 20, 2023.

6 4. The parties agree and stipulate, and request that the Court find the following:

7 a) 1,655 pages of Bates-stamped material has been provided to the defense in this
8 matter. This material consists of wiretap intercepts and data, reports of investigation,
9 photographs, recordings of post-arrest interviews, and defendant's criminal histories.

10 b) Plea offers have been made to all of the defendants.

11 c) There is a pending conflict of interest motion filed by the government as to
12 defendants Calderon-Campos and Beltran-Chaidez, to which the defense intends to submit a
13 response. The parties also intend to set a hearing to address the potential conflict in advance of
14 the status conference date.

15 d) Counsel for defendants desire additional time to review discovery, consult with
16 their clients, conduct investigation and research related to the charges, consider plea offers,
17 engage in plea negotiations, and to otherwise prepare for trial.

18 e) Counsel for defendants believe that failure to grant the above-requested
19 continuance would deny them the reasonable time necessary for effective preparation, taking into
20 account the exercise of due diligence.

21 f) Based on the above-stated findings, the ends of justice served by continuing the
22 case as requested outweigh the interest of the public and the defendants in a trial within the
23 original date prescribed by the Speedy Trial Act.

24 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
25 *et seq.*, within which trial must commence, the time period of June 7, 2023 to September 20,
26 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it
27 results from a continuance granted by the Court at the defendants' request on the basis of the
28 Court's finding that the ends of justice served by taking such action outweigh the best interest of

1 the public and the defendants in a speedy trial.

2 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
3 Speedy Trial Act provide that additional time periods are excludable from the period within which a trial
4 must commence.

5 IT IS SO STIPULATED.

6 Dated: May 25, 2023

7 PHILLIP A. TALBERT
United States Attorney

8 /s/ KAREN A. ESCOBAR
9 KAREN A. ESCOBAR
10 Assistant United States Attorney

11 /s/ DAVID A. TORRES
12 DAVID A. TORRES
13 Counsel for defendant Jorge Calderon-Campos

14 /s/ MICHAEL E. MITCHELL
15 MICHAEL E. MITCHELL
16 Counsel for defendant Alberto Gomez-Santiago

17 /s/ FATIMA RODRIGUEZ
18 FATIMA RODRIGUEZ
19 Counsel for defendant Byron Adilio Alfaro-
Sandoval

20 /s/ PATRICK S. AGUIRRE
21 PATRICK A. AGUIRRE
22 Counsel for defendant Francisco Javier Torres-
Mora

23 /s/ ALEKXIA L. TORRES STALLINGS
24 ALEKXIA L. TORRES STALLINGS
25 Counsel for defendant Jose Angel Beltran-
Chaidez

26 /s/ MARK A. BROUGHTON
27 MARK A. BROUGHTON
28 Counsel for defendant Mark Garcia

21 ORDER

22 IT IS SO ORDERED.

23 DATED: 5/30/2023

24 *Sheila K. Oberto*

25 THE HONORABLE SHEILA K. OBERTO
26 UNITED STATES MAGISTRATE JUDGE